Zamora, Courtney

From: Parana, Gregory [ParanaGP@cdm.com]
Sent: Tuesday, May 25, 2004 7:55 PM
To: 'Courtney Zamora (Courtney Zamora)'; Supernaugh, Scott; Lammers, Paul
Cc: Oliveira, Shawn
Subject: Comments-WRGrace Flyway HASP

Courtney,

I've reviewed the WR Grace Flyway HASP and my comments are as follows;

Section 4

- Asbestos is a mineral. I've never seen it classified as a chemical.
- I am not aware of any poisonous snakes in this area. Although I would keep the reference to tetanus from non-venomous snake bites.
- I do not see the need to tie-off when working near the river bank. Requiring employees to wear life vest seems more applicable.

Section 5

- I would include a statement about demarcation of the EZ, CRZ and SZ.
- Storage of hazardous materials and fuels should be in accordance with NFPA, OSHA and the manufacturer's recommendations.
- Table A-4, 4th bulleted items ... Respiratory protection is required in the EZ.
- Page A-5-5 Define "Safety Can"
- Page A-5-6 Table A-5 Replace polypropylene coverall with poly coated tyvek or equivalent
- I see zero historical data included in this plan that supports the use of ½ face APRs for this work. I am especially concerned that the assumption is made that the ½ face APRs are adequate for operations at the mine. I would suggest either including historical data to support this assumption or start out in a higher level of respiratory protection and conduct a task specific exposure assessment. Then data will support the level of respiratory protection required during operations.

Section 6

- You state that no background air sample will be collected and contradict this statement by explaining the process, pick one. How will the downwind locations be determined? I do not see any reference to a MET station to help determine where downwind actually is. This will also help define evacuation muster points stated later in this documented.
- I would suggest conducting an initial exposure assessment that could eliminate the need to collect daily air sampling if results are consistently below the PEL and the proper level of respiratory protections is selected based on the results.
- I do not see the need to collect anymore background air samples or final clearance air samples during soil removals. This direction is in-line with our current air sampling plan.
- Table A-6 the Test Method column has TWA and 30 minute exc. that are sample types. This should be AHERA.
- A perimeter sample trigger level for TEM AHERA analysis needs defined. I would suggest any perimeter air sample PCM result > or equal to 0.01 f/cc be analyzed by TEM.

Section 8

- Item #7 Respirators should always be used if moving through the dirty room into the shower.
- Item #9 Traffic vests should stay in the dirty room.

- Section 8.2- Define "decontamination solution"
- Section 8.3- Define "Flyway site disposal area"

Section 9

- 9.8.1 Include re-fueling trucks and site vehicles in the possible sources of spills > 25 gallons.
- 9.8.2 Damaged or weakened drums should be removed from the site.
- 9.9 By what means will a fire be smothered?

Section 10

- What time period will personnel be notified of the sampling results?

Air Monitoring Plan

- No QC samples are written into the sampling plan. Although there is mention of side by side sample to determine effective fiber counting strategies, no frequency or mention that it will be conducted is outlined in this plan. Include the planned field blank frequency.
- Two downwind air samples are not adequate to monitor this work based on historical sampling and wind direction.
- Use 0.8 micron PCM cassettes for all sampling.
- The plan states that rotometers will be calibrated quarterly but does not mention the required calculation for using the rotometer in a location where the temp and barometric pressure is different. The easiest fix is to calibrate the rotometers in Libby and this should be stated in the plan. Otherwise, it should state that the data will be corrected for using the rotometer in an area with a different temp and barometric pressure than the location it was calibrated.

If I need to clarify any of these comments, let me know.

Thanks,

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